



Sheppard, Mullin, Richter & Hampton LLP
30 Rockefeller Plaza
New York, New York 10112-0015
212.653.8700 main
212.653.8701 fax
www.sheppardmullin.com

MEMORANDUM ENDORSED

Danielle Vrabie
212.634.3081 direct
DVrabie@sheppardmullin.com

May 16, 2023

VIA ECF

The Honorable Judge Gabriel W. Gorenstein
Courtroom 6B
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: United States ex rel. Raffington v. Bon Secours, et al.,
Case No. 10-cv-9650 (RMB)(GWG)**

Dear Judge Gorenstein,

Relator June Raffington and Defendants Bon Secours Health System, Inc., Bon Secours New York Health System, and Schervier Long Term Home Health Care Program (collectively, the "Parties") jointly submit this letter requesting a stay of the briefing schedule set forth in Your Honor's March 29, 2023 Order (Dkt. No. 571).

The Parties have conferred and believe that they should explore a potential settlement of this matter. Accordingly, the parties are pursuing a private mediation. In order to facilitate that process, they jointly request that the Court enter an order indefinitely staying the May 19, 2023 deadline for motions for summary judgment. The Parties further propose that they file a joint status report with the Court no later than September 6, 2023 informing the Court if they believe that further time is necessary to complete the mediation process or if summary judgment briefing should resume. If the Parties intend to proceed with motions for summary judgment, they will propose a schedule for such briefing in the joint status report.

Respectfully submitted,

Danielle Vrabie/DTF

Danielle Vrabie
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

At the parties' request, the deadline for filing summary judgment motions is adjourned sine die. On or before September 6, 2023, the parties shall file a letter proposing a date for the filing of such motions.

So Ordered.



GABRIEL W. CORENSTEIN
United States Magistrate Judge

May 17, 2023